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 9 DREW DESBORDES

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11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA

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14 ASHLEY PARHAM, JANE DOE, and
 15 JOHN DOE,

16 Plaintiffs,

17 vs.

18 SEAN COMBS, KRISTINA
 19 KHORRAMN, SHANE PEARCE,
 RUBEN VALDEZ, JOHN
 PELLETIER, ODELL BECKHAM JR.,
 DREW DESBORDES, JACQUELYN
 WRIGHT, HELENA HARRIS-SCOTT,
 MATIAS GONZALEZ, BRANDI
 CUNNINGHAM, JANICE COMBS,
 KEITH LUCKS, and JOHN AND
 JANE DOES 1-10,

20 Defendants.

21 Case No. 3:24-CV-07191-RFL

22 Assigned to Hon. Rita F. Lin

23 **ADMINISTRATIVE MOTION OF
 24 DREW DESBORDES TO FILE
 25 UNDER SEAL CERTAIN
 26 DOCUMENTS IN MOTION FOR
 27 SANCTIONS**

28 Complaint Filed: 10/15/24

1 Defendant Drew Desbordes respectfully requests an order sealing certain
2 unredacted documents which are being filed in connection with Mr. Desbordes's
3 Declaration in support of his motion for Rule 11 sanctions ("Desbordes Decl.").
4 The Confidential Documents contain confidential and personal information of Mr.
5 Desbordes and third parties.

6 This motion is made pursuant to Civil Local Rules 7-11 and 79-5. The
7 unredacted versions of the Confidential Documents are attached to the declaration of
8 David Grossman attached hereto (“Grossman Decl.”), with the redactions
9 highlighted per the Court’s Civil Standing Order. The redactions are also identified
10 in the accompanying proposed order.

ARGUMENT

12 A party must assert a “compelling reason” to seal judicial records attached to
13 a motion. *Kamakana v. City and County of Honolulu*, 447 F.3d 1172, 1179 (9th Cir.
14 2006). Protecting third party privacy interests is a compelling reason permitting
15 sealing. *See Icon-IP Pty Ltd. v. Specialized Bicycle Components, Inc.*, 2015 U.S.
16 Dist. LEXIS 26519 at *3 (N.D. Cal. Mar. 4, 2015) (noting that “invasion of [a] third
17 party’s privacy” constitutes a compelling reason to file an exhibit under seal); *see*
18 *also Virun, Inc. v. Cymbiotika, LLC*, 2022 U.S. Dist. LEXIS 172312, at *7 (C.D.
19 Cal. Aug. 19, 2022) (explaining court regularly allowing sealing of names of third
20 parties “whose identities are not generally known to the public and who have an
21 interest in maintaining their privacy” (cleaned up)). As is protecting the personal
22 identifying information and financial account numbers of a party. *See Berton v.*
23 *Aetna, Inc.*, 2024 U.S. Dist. LEXIS 35556, at *21 (N.D. Cal. Feb. 9, 2024) (sealing
24 of party home address, telephone number and other personally-identifiable
25 information proper); *Compeer Fin. Aca v. Graham*, 2025 U.S. Dist. LEXIS 71758,
26 at *4 (E.D. Cal. Apr. 15, 2025) (collecting cases finding compelling reasons for
27 sealing of plaintiff and third party financial and personal identifying information).

1 Here, the information sought to be redacted is narrowly tailored to fall within
2 those categories:

- Mr. Desbordes's personally-identifiable information (date of birth, social security number), Exhibit 5 at 2, Exhibit 6 at 2;
- Street addresses of Mr. Desbordes and other individuals, Exhibit 1 at 1, Exhibit 5 at 2, Exhibit 6 at 2, Exhibit 11 at 1;
- The last four digits of Mr. Desbordes's and others telephone numbers, Exhibit 10 at 1-4, Exhibit 11 at 3-4;
- Financial and telephone account numbers, Exhibit 1 at 1-2, , Exhibit 10 at 1-4, Exhibit 11 at 1-4;
- Third party names, Exhibit 1 at 2.

12 No purpose would be served by disclosing the private contact or financial
13 information of Mr. Desbordes or third parties. While Mr. Desbordes was not a
14 public figure at the time of the events discussed in Plaintiffs allegations, he is now.
15 Grossman Decl. ¶ 3. This case has been covered in the media. Grossman Decl. ¶ 4.
16 Releasing Mr. Desbordes' and his associates' telephone numbers, financial account
17 numbers, addresses, or other identifying information would put them at risk of
18 identity theft or other disruption. *See Nursing Home Pension Fund v. Oracle Corp.*,
19 2007 U.S. Dist. LEXIS 84000, at *10-11 (N.D. Cal. Oct. 31, 2007) ("The Ninth
20 Circuit has found that compelling reasons exist to keep personal information
21 confidential to protect an individual's privacy interest and to prevent exposure to
22 harm or identity theft."). And portions of the information sought to be filed under
23 seal, including the residential addresses, is independently permitted to be redacted
24 per Federal Rule of Civil Procedure 5.2 and L.R. 5.2-1.

CONCLUSION

26 For the foregoing reasons, Mr. Desbordes respectfully requests that the Court
27 permit him to file certain documents under seal as specified in the proposed order
28 submitted concurrently.

1 Dated: May 9, 2025

LOEB & LOEB LLP

2 By: /s/ David Grossman

3 David Grossman

4 Attorneys for Defendant Drew Desbordes

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